

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

KEVIN MCKEITHER	:	CIVIL ACTION
Petitioner,	:	
V.	:	
THERESA DELBALSO, et al.	:	No. 14-1628
Respondents.	:	

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO PETITION FOR
WRIT OF HABEAS CORPUS**

Petitioner is a Pennsylvania state prisoner who was convicted of burglary, robbery, rape, and related charges following a vicious attack on an elderly woman, and sentenced to an aggregate term of 30 to 60 years' imprisonment. In 2014, he filed the above-captioned *Petition for Writ of Habeas Corpus*. This Court directed the Commonwealth to file a brief for respondents by June 30, 2014. Unfortunately, the Commonwealth cannot meet that deadline, and respectfully requests more time.

This is the Commonwealth's third and final request for an extension in this matter. The assigned attorney has finished writing the brief for respondents in this case, but needs an additional week to incorporate necessary edits. Accordingly, the Commonwealth respectfully requests an additional 7 days to finish and file its brief.

Respectfully submitted,

/s/ Jennifer O. Andress

JENNIFER O. ANDRESS
Assistant District Attorney

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KEVIN MCKEITHER	:	CIVIL ACTION
Petitioner,		
V.	:	
THERESA DELBALSO, et al.	:	No. 14-1628
Respondents.		

CERTIFICATE OF SERVICE

I, JENNIFER O. ANDRESS, counsel for appellants, hereby certify that on June 30, 2014,
a copy of the foregoing motion was served by first-class U.S. Mail on petitioner:

Kevin McKeither
HV-5414
660 State Route 11
Hunlock Creek, PA 18621

/s/ Jennifer O. Andress

JENNIFER O. ANDRESS
Assistant District Attorney

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KEVIN MCKEITHER	:	CIVIL ACTION
Petitioner,		
V.	:	
THERESA DELBALSO, et al.	:	No. 14-1628
Respondents.		

ORDER

AND NOW, this _____ day of _____, 2014,
the Commonwealth's response to the Petition for Writ of Habeas Corpus is due on or July 7,
2014.

BY THE COURT:

J.